

# EXHIBIT B

Page 1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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AA MEDICAL, P.C.,

Plaintiff,

v.

IRON WORKERS LOCALS 40, 361 & 417

HEALTH FUND,

Defendant.

Case No.

2:22-cv-

01249

(ENV) (LGD)

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DEPOSITION OF NAKUL KARKARE, M.D.

DATE: Wednesday, August 28, 2024

TIME: 12:06 p.m.

LOCATION: Remote Proceeding

2500 Nesconset Highway

Stony Brook, NY 11790

REPORTED BY: Paul Chamberlain

JOB NO.: 6869664

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF AA MEDICAL, P.C.:

RYAN MILUN, ESQUIRE (by videoconference)

The Milun Law Firm, LLC

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ON BEHALF OF DEFENDANT IRON WORKERS LOCALS 40, 361 &  
417 HEALTH FUND:

THOMAS KEANE, ESQUIRE (by videoconference)

Colleran, O'Hara & Mills, LLP

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516-248-5757

I N D E X

EXAMINATION:

PAGE

By Mr. Keane

6

E X H I B I T S

NO.

DESCRIPTION

PAGE

(None marked.)

D O C U M E N T S R E Q U E S T E D

NO.

DESCRIPTION

PAGE

1

Record showing how the  
appeal form, dated  
12/15/2021, was sent to  
the insurance company

22

2

Record showing how the bill,  
dated 9/28/2021, was sent to  
the appeal department

26

N. KARKARE

THE REPORTER: Good afternoon. My name is Paul Chamberlain; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 12:06 p.m.

This is the deposition of Nakul Karkare taken in the matter of AA Medical, P.C. against Iron Workers Locals 40, 361, and 417 Health Fund on August 28, 2024.

I am a notary authorized to take acknowledgments and administer oaths in New York. Parties agree that I will swear in the witness remotely outside of his presence.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording virtually of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by

1 N. KARKARE

2 stenographic means; and

3 - shall constitute written  
4 stipulation of such.

5 At this time will everyone in  
6 attendance please identify yourself for  
7 the record, beginning with Plaintiff's  
8 counsel.

9 MR. MILUN: Ryan Milun, The Milun Law  
10 Firm, for the plaintiff.

11 MR. KEANE: Tom Keane, Colleran,  
12 O'Hara & Mills, for the defendant.

13 THE REPORTER: And --

14 DR. KARKARE: And you got me. Nakul  
15 Karkare. I'm the owner of AA Medical,  
16 P.C.

17 THE REPORTER: Thank you. And will  
18 you please state your address for the  
19 record?

20 DR. KARKARE: Sure. My address is  
21 2500 Nesconset Highway, Stony Brook, New  
22 York. Let's see. The ZIP Code there is  
23 11790.

24 THE REPORTER: Thank you. Hearing no  
25 objection, I will now swear in the

1 N. KARKARE

2 witness. Please raise your right hand.

3 WHEREUPON,

4 NAKUL KARKARE, M.D.,

5 called as a witness and having been first

6 duly sworn to tell the truth, the whole

7 truth, and nothing but the truth, was

8 examined and testified as follows:

9 THE REPORTER: Thank you. You may  
10 proceed.

11 MR. KEANE: All right. Thank you.

12 EXAMINATION

13 BY MR. KEANE:

14 Q Dr. Karkare, my name's Tom  
15 Keane. I'm the attorney for the  
16 defendant, the Iron Workers Local 40, 361,  
17 and 417 Health Fund.

18 A Hello.

19 Q Hello. I have some questions  
20 for you today. Hopefully, we'll be able  
21 to move through this relatively quickly.  
22 So before we get started, is anyone else  
23 in the room with you?

24 A No.

25 Q Okay. Now, have you ever been

1 N. KARKARE

2 deposed before, Dr. Karkare?

3 A Yes, for workers' compensation  
4 as a witness. I am the treating doctor  
5 for numerous patients who have workers'  
6 compensation insurance, and I do get  
7 deposed for those cases.

8 Q So I'm just going to go over  
9 some instructions with you. And I do want  
10 to make sure -- am I pronouncing your last  
11 name correctly, sir?

12 A The beauty about my last name is  
13 whichever way you say it, it's right. So  
14 it's good.

15 Q Well, I -- if I do mispronounce  
16 your name, please tell me.

17 A Right.

18 Q I want to show you that  
19 courtesy.

20 A No. It's fine. It's Karkare.

21 Q Karkare?

22 A Karkare. Like a car. Karkare.

23 Q Okay. Thank you. So all of  
24 your answers today need to be verbal.

25 Only one person should be speaking at a



1 N. KARKARE

2 time. I'll ask that you wait until I  
3 finish asking the question before you  
4 answer, and I will extend that same  
5 courtesy to you.

6 A Okay.

7 Q If, for whatever reason, you  
8 need to take a break today -- use the  
9 bathroom, stretch your legs -- that's  
10 fine. All I would ask is that you answer  
11 any pending questions before you take the  
12 break.

13 A Got it.

14 Q I'd ask that if you don't  
15 understand a question that you tell me  
16 that you don't understand the question,  
17 and I'll try to rephrase it to make it  
18 clearer.

19 A Got it.

20 Q Did you review any documents  
21 before today's deposition?

22 A Yeah. I reviewed the clinicals.

23 Q Any other documents?

24 A That's it.

25 Q Did you speak with anyone, other

1 N. KARKARE

2 than your attorney, about this deposition?

3 A No.

4 Q All right. So where are you  
5 currently employed?

6 A I am employed by my own  
7 practice, AA Medical, P.C. I'm the owner  
8 of the business.

9 Q And how long have you owned AA  
10 Medical?

11 A Since 2012.

12 Q All right. And you're aware  
13 that AA Medical filed the lawsuit against  
14 my client, the Iron Workers Health Fund?

15 A Yes.

16 Q And for ease -- for just ease of  
17 the conversation, if I refer to "the  
18 Health Fund," I'm referring to the Iron  
19 Workers Local 43, 361, and 417 Health  
20 Fund.

21 A Okay.

22 Q Does that make sense to you?

23 A Got it.

24 Q Thank you. All right. So are  
25 you familiar with the date of service --

1 N. KARKARE

2 or the service that's at issue in this  
3 lawsuit?

4 A Yeah. I have the clinicals. I  
5 can pull them up, if you like.

6 Q We might get into that, but --

7 A Okay.

8 Q Do you know when the date of  
9 service was for this?

10 A I'll have to look. If you want  
11 me to look, I can tell you.

12 Q Well, so generally, I want you  
13 to testify as to what you recall. I may  
14 put some documents on the screen, or as we  
15 go through the deposition, but I'd  
16 rather -- if you don't remember, or you're  
17 not sure, I'd rather you tell me that.

18 A Right. I -- I -- my  
19 recollection -- I don't want to rely on  
20 that. I can read the documents to you. I  
21 am not the surgeon who treated the  
22 patient, for the record. So whatever I do  
23 today will be based on the documents.

24 Q Okay. Then why don't we do  
25 this. I'm going to put -- can we just go

1 N. KARKARE

2 off the record for a second?

3 THE REPORTER: Sure. Off the record,  
4 12:13.

5 (Off the record.)

6 THE REPORTER: Back on the record,  
7 12:13.

8 BY MR. KEANE:

9 Q All right. So I'm putting on  
10 the screen now -- Dr. Karkare, can you  
11 confirm that you can see this?

12 A Yes. Yeah. Very clear.

13 Q All right. Thank you. Do you  
14 need me to zoom in at all?

15 A No. I can read.

16 Q I'll zoom in a little just to  
17 make it easier.

18 A Okay. Thank you.

19 Q So when you said you reviewed  
20 "the clinicals," is this the sort of  
21 document that you were reviewing?

22 A I reviewed the chart, so this  
23 gets placed into the chart, and this is  
24 the intake.

25 Q Okay. This is the intake.

1 N. KARKARE

2 A Mm-hmm.

3 Q This is still the intake?

4 A Yeah.

5 Q Okay. Now this is -- these are  
6 documents that were provided by your  
7 attorneys in response to discovery  
8 demand --

9 A Okay.

10 Q -- from my office.

11 A Okay.

12 Q So I'm just scrolling through to  
13 where I think the chart is --

14 A Okay.

15 Q -- but bear with me for a  
16 moment.

17 A Okay.

18 Q This all appears to still be the  
19 intake form?

20 A Yeah.

21 Q Thank you. Now, this document  
22 here -- gesundheit. Do you need a moment,  
23 sir?

24 A No. I'm good.

25 Q Okay. Now, this document here,

1 N. KARKARE

2 the "Self-Insurance Claim Form," we'll get  
3 to it. But this is not part of the chart;  
4 correct?

5 A That's right.

6 Q All right. So here on the 13th  
7 page of the production -- St. Catherine of  
8 Siena Medical Center -- is this the chart?

9 A Yes.

10 Q Okay.

11 A It's the operative report, just  
12 like it says.

13 Q So the date of this procedure,  
14 can you just confirm what the date of the  
15 procedure was?

16 A Yeah; 6/16/2021.

17 Q Thank you. And what was the  
18 procedure here?

19 A It says it's left knee medial  
20 meniscus root repair, along with a left  
21 knee lateral meniscus repair, along with  
22 left knee microfracture chondroplasty.

23 Q All right. And can you just  
24 describe to me, in layman terms, what that  
25 means?

1 N. KARKARE

2 A Sure. It means that Dr. Vaksha  
3 repaired the cushion between the two bones  
4 on the inside of the knee and outside of  
5 the knee. What he also did was create a  
6 small opening in the bone to get out the  
7 stem cells to help in healing of whatever  
8 he did.

9 Q All right. Thank you. And  
10 is -- this is the procedure that AA  
11 Medical filed a lawsuit over? Is that  
12 correct?

13 A I believe so.

14 Q Okay. Did AA Medical have to  
15 get preapproval for this procedure from  
16 the patient's insurance company?

17 A We get a preapproval for all our  
18 elective cases, so I'm sure we get -- got  
19 a preapproval for this one too. I'll have  
20 to look in the chart to see what date and  
21 what number. But as -- as a procedure, we  
22 always get a preapproval for all elective  
23 cases. Without that, the hospital does  
24 not authorize the procedure. We do not do  
25 the procedure -- cannot do the procedure

1 N. KARKARE

2 without that.

3 Q So that's -- St. Catherine  
4 wouldn't have allowed the surgeon to  
5 perform without preapproval?

6 A That's right.

7 Q And you said that AA Medical  
8 gets preapproval for all elective  
9 procedures?

10 A That's correct.

11 Q So this procedure on June 16,  
12 2021, that was elective?

13 A Yes.

14 Q Okay. And so when you went --  
15 when AA Medical goes for preapproval, is  
16 that -- to whom is that directed towards?  
17 Who do they make that request to?

18 A To the insurance company.

19 Q And this patient, do you know  
20 who his insurance company was?

21 A I'll have to look it up, but I'm  
22 guessing probably the Health Fund that we  
23 are talking about today.

24 Q Do you know for sure?

25 A I will have to look it up.



1 N. KARKARE

2 Q Okay. Well, how does AA Medical  
3 determine who the patient's insurance  
4 provider is?

5 A Oh. Well, we get the insurance  
6 information from the patient, and then we  
7 contact the insurance company, do  
8 eligibility verification, and put it in  
9 the chart.

10 Q So is AA Medical requesting  
11 copies of the patient's insurance card?

12 A Yeah. We do that when the  
13 patient comes to the office.

14 Q Is there any other information  
15 that you request from the -- that AA  
16 Medical requests from the patients in  
17 order to determine who their insurance  
18 company is?

19 A No. The insurance company  
20 member ID and the insurance company name.  
21 That's it.

22 Q And so before this surgery could  
23 have taken place on June 16, 2021, AA  
24 Medical would have had to contact the  
25 patient's insurance company and get

1 N. KARKARE

2 preapproval for these operations?

3 A Like I said before, yes.

4 Q I'm going to stop the screen  
5 share. I may come back to it later, but I  
6 don't need it for right now.

7 So to your knowledge, does AA --  
8 has AA Medical had patients covered by the  
9 Iron Workers Health Fund before?

10 A Probably. I'll have to run a  
11 report. Then I can tell you.

12 Q When you say "run a report,"  
13 what do you mean by that?

14 A Run a report of insurances and  
15 tell which patients were treated by which  
16 insurance company by us.

17 Q All right. So has AA Medical  
18 ever submitted a claim -- are you aware of  
19 AA Medical submitting claims to the Iron  
20 Workers Health Fund before?

21 A We probably did, if we saw the  
22 patient.

23 Q Are you personally familiar with  
24 any claims that have been submitted to the  
25 Iron Workers Health Fund?

1 N. KARKARE

2 A No. I'll have to run a report,  
3 like I said before.

4 Q Okay. So I want to take a step  
5 back. So when AA Medical performed -- no.  
6 Actually, let me confirm this. I know you  
7 were not the treating physician on June  
8 16, 2021. Who was the treating physician?

9 A Dr. Vedant Vaksha.

10 Q And he is an employee of AA  
11 Medical?

12 A That's right.

13 Q All right. Thank you. So when  
14 AA Medical performs an elective surgery,  
15 like the one -- like this one, who  
16 generates the bill that -- who generates  
17 the bill?

18 A Well, the billing department.

19 Q And who -- does anyone have to  
20 approve that bill before it gets sent out?

21 A Yes.

22 Q Who has to approve the bill?

23 A The surgeon submits the codes.  
24 The surgeon approves the codes. The  
25 billing department sends out the bill.

1 N. KARKARE

2 Q And how soon after a surgery is  
3 performed does the bill go out, generally?

4 A Base, two weeks.

5 Q Is that an automated process, or  
6 is somebody in the billing department  
7 manually doing this work?

8 A Manually doing this work.

9 Q And do you know how the billing  
10 department sends the bill? Are they  
11 mailing it, faxing it? Do you know?

12 A It's sent electronically to the  
13 clearing house, unless there are some  
14 insurance which don't accept electronic  
15 claims there. Then we -- the claims to  
16 paper and send it. And a electronic  
17 medical record company does that for us.

18 Q What's the name of that company?

19 A We currently use Athena.

20 Q Is that A-T-H-E-N-A?

21 A Correct. You're very good at  
22 understanding my accent, I must say.

23 Q Well, thank you. I think you're  
24 pretty clear, for what it's worth.

25 A All right.

1 N. KARKARE

2 Q So bear with me just one moment.  
3 I'll just share my screen again. All  
4 right. Can you see this?

5 A Yep.

6 Q This is on page 12 of  
7 Plaintiff's document production. Dr.  
8 Karkare, is this the bill?

9 A Yeah.

10 Q Okay. And I see -- it says  
11 "Signature on File." That's just the  
12 patient's signature that you have on file;  
13 correct?

14 A "Patient's authorized" -- yeah.  
15 That's what it reads there, so that's what  
16 I would assume.

17 Q Now, did you personally see this  
18 bill before it went out?

19 A No. I -- I don't see every bill  
20 that goes out.

21 Q Okay.

22 A The surgeon reviews the codes.  
23 The billing department sends out those  
24 codes.

25 Q All right. And do you know if

1 N. KARKARE

2 AA Medical got paid on this bill?

3 A I'll have to look up the amount,  
4 and if I got paid, and on which code.

5 Q Okay. Let's scroll up to --  
6 this is page 10 of the document  
7 production. Are you familiar with this  
8 document, sir?

9 A Yeah.

10 Q Okay. What is this document?

11 A This looks like appeal form sent  
12 by Donna Aiello, our billing  
13 administrator.

14 Q All right. Do you know how  
15 Donna Aiello would have sent this?

16 A Probably, as I said, you know,  
17 electronically faxed it, or if the  
18 insurance company doesn't accept  
19 electronic faxes, we could have mailed it  
20 to the insurance company. Again, like I  
21 said, I will have to look up exactly how  
22 it was sent.

23 Q So AA Medical would have some  
24 sort of a record of how they sent this  
25 particular bill?

1 N. KARKARE

2 A Absolutely.

3 Q All right. I am going to make a  
4 request for whatever that record is that  
5 would show how this was sent.

6 A Okay.

7 Q I'll follow up with your  
8 attorney on that.

9 A Okay. All right.

10 Q Now, so this document that we're  
11 looking at -- was this something that you  
12 would have seen before it went out?

13 A No.

14 Q Okay. And I see that it was  
15 addressed "Attention: Iron Workers Claim  
16 Department." Do you have any -- are you  
17 personally familiar with the claim  
18 department at the Iron Workers Health  
19 Fund?

20 A No.

21 Q Is there anyone who works for AA  
22 Medical who would know, who would have  
23 that familiarity?

24 A I mean, our billing team would  
25 know more about the claim department and,

1 N. KARKARE

2 you know, which fax number it was sent to,  
3 or was it mailed, or how it came to you.

4 Q So would Donna Aiello have  
5 personal knowledge as to how a claim like  
6 this was sent out?

7 A Yeah.

8 Q Do you know if AA Medical  
9 received any response to this  
10 communication?

11 A Again, like I said, I'll have to  
12 look at the records. For the record,  
13 going forward, anything that I don't see  
14 on the screen, I will have to look up,  
15 like I said before.

16 Q Well, so then, I'll ask this  
17 sort of generally. Do you have any  
18 personal knowledge, generally, about bills  
19 that go out and the communications with  
20 the insurance companies?

21 A I'm the one who set the  
22 protocols. Do I review every bill, every  
23 claim that goes out? No. I cannot do  
24 that.

25 Q All right. So you generally



1 N. KARKARE

2 know what the protocols are for getting  
3 the bills out, but --

4 A Correct. Yeah.

5 Q -- but for these bills, you  
6 don't have any recollection of seeing  
7 them?

8 A No. Like I said, it's  
9 impossible for me to see every claim that  
10 goes out. I'm a practicing orthopedic  
11 surgeon, and we have a billing team who  
12 sends out the -- virtual connectivity  
13 interruption --

14 Q I'm just going to move to page  
15 17 of the document production. All right.  
16 Can you see this?

17 A Yeah.

18 Q So tell me, if you know, what  
19 this document is?

20 A I'm just moving the screen a  
21 little away so, you know, the camera may  
22 be pointing a little upward. "Records  
23 indicate that claims for the -- were  
24 underpaid. We're requesting that you send  
25 the plan documents." Yeah. So just like

1 N. KARKARE

2 it says, "we are requesting the plan  
3 documents, and we are also appealing this  
4 claim."

5 Q All right. Now, I note that  
6 this is dated September 28, 2021. And the  
7 last document we looked at on page 10 of  
8 the production is dated December 15, 2021.

9 A Okay.

10 Q Do you know why -- do you know  
11 why the earlier document is addressed to  
12 the appeal department and the later  
13 document is addressed to the claims  
14 department?

15 A No. I don't know. But a  
16 possibility is that the insurance company  
17 asked us to do that.

18 Q And I see on the top here -- and  
19 I'll highlight it -- a fax number. Is  
20 that -- do you know what that fax number  
21 is?

22 A No. The fax number on this  
23 appeal; that's all I know.

24 Q Okay. So is that AA Medical's  
25 fax number?

1 N. KARKARE

2 A No. No. Our fax number is  
3 below.

4 Q Is that the 212 number here?

5 A Correct.

6 Q Thank you. And -- sorry. Do  
7 you have any personal knowledge as to how  
8 this bill was sent to the appeal  
9 department?

10 A No. Like I said before, I'll  
11 have to look it up. Looking at this, it  
12 may have been faxed, but I'm not sure.

13 Q All right. I'm going to request  
14 a copy of whatever record would show how  
15 this was sent to the health -- sent to the  
16 appeal department.

17 A Okay.

18 Q So I see that in this document,  
19 AA Medical claims that it was underpaid.  
20 When AA Medical believes that a claim is  
21 underpaid, do you -- what does AA -- does  
22 AA Medical send any sort of documentation  
23 to support what they claim they should be  
24 paid?

25 A The billed amount is clearly

1 N. KARKARE

2 mentioned in the submitted claim. Any  
3 amount less than the billed amount is  
4 underpayment.

5 Q Do you know if AA Medical  
6 receives an explanation of benefits from  
7 the Health Fund?

8 A Did they receive an explanation  
9 of benefits? I would have to look at the  
10 chart if they did.

11 Q Do you know, is AA Medical an  
12 in-network healthcare provider for the  
13 Health Fund?

14 A We are out-of-network provider.

15 Q If AA Medical is underpaid, does  
16 the billing department get you involved  
17 with the appeal?

18 A No. No.

19 Q Other than setting up the  
20 protocols, do you have any direct  
21 involvement with the billing process for  
22 AA Medical?

23 A I personally order charts  
24 occasionally to make sure everything is  
25 exactly the way it should be.

1 N. KARKARE

2 Q And are you -- so are you  
3 auditing the process, or you're auditing  
4 particular bills?

5 A Everything.

6 Q I'm sorry. Did you say  
7 "everything"?

8 A Yes.

9 Q Okay. And if an insurance  
10 company denies a claim, are you personally  
11 involved with AA Medical's appeal of the  
12 denied claim?

13 A Like I said, no; not for every  
14 appeal that goes out.

15 Q And for the service at issue in  
16 this case that was performed on June 16,  
17 2021, you weren't involved with the  
18 billing of that procedure; correct?

19 A That's right.

20 Q And you weren't involved with  
21 the appeal of the denial of claims?

22 A Yeah. Like I said before, I  
23 wasn't involved in that.

24 Q And is Donna Aiello -- is she  
25 the person who would have the -- I'll

1 N. KARKARE

2 strike the question. The form I'm looking  
3 at identifies Donna Aiello as the billing  
4 administrator. Is she still AA Medical's  
5 billing administrator?

6 A Yes; she is.

7 Q Okay. And is Ms. Aiello  
8 personally involved with getting the bills  
9 out and submitting appeals?

10 A There's somebody who submits the  
11 bills, but she follows up on them, and  
12 she's in charge of the appeals.

13 Q Would Ms. Aiello -- is Ms.  
14 Aiello likely to have knowledge as to  
15 how -- whether or not AA Medical appealed  
16 this denial of claims?

17 A Yeah. Absolutely.

18 Q Okay.

19 A I mean, what I see here is that  
20 she's the one who appealed it.

21 MR. KEANE: Can we go off the record  
22 for a second?

23 THE REPORTER: Sure thing. Off the  
24 record, 12:41.

25 (Off the record.)

1 N. KARKARE

2 THE REPORTER: Back on the record,  
3 1:01 p.m.

4 MR. KEANE: Thank you.

5 BY MR. KEANE:

6 Q All right. So I have a couple  
7 of questions. I do just want to state  
8 that I will be following up with your  
9 attorney, Dr. Karkare, regarding some  
10 information requests for some records you  
11 referenced, you know, and the Defendant  
12 reserves their right to call Donna Aiello  
13 as a witness.

14 You know, as I had mentioned in  
15 the -- during the conference before the  
16 magistrate on July 31st, the Health Fund  
17 was most interested in speaking with  
18 someone who had personal knowledge of the  
19 appeal that was filed by AA Medical. So  
20 we reserve our right to call an additional  
21 witness with more knowledge than you about  
22 that. But we'll see what those -- what  
23 the records produced say.

24 So just a couple of final -- a  
25 couple of, hopefully, quick questions for

1 N. KARKARE

2 you, Dr. Karkare.

3 A Sure.

4 Q Are you familiar with the  
5 Journal of Arthroscopy?

6 A Yeah.

7 Q Okay. Are you aware that in an  
8 amended complaint in this case your prior  
9 attorney cited a few -- a couple of  
10 articles from the Journal of Arthroscopy?

11 A I know they cited some  
12 scientific literature.

13 Q Okay. Are you aware of what  
14 those -- what that literature was?

15 A I would have to look up the  
16 literature that was submitted.

17 Q And to your knowledge, was any  
18 of that literature ever submitted to the  
19 Health Fund?

20 A I'll have to look it up.

21 Q Okay. Are you aware that your  
22 attorneys, in responding to discovery,  
23 have already said that literature was  
24 never submitted to the Health Fund?

25 A I'll have to look it up.



1 N. KARKARE

2 Q Okay.

3 A What I can tell you, as a  
4 protocolist -- they ask for something, we  
5 do submit it. If it were asked, it would  
6 have been submitted.

7 Q All right. Thank you. And are  
8 you familiar with any other lawsuits that  
9 AA Medical has filed against my client in  
10 the past?

11 A I'll have to look it up.

12 MR. KEANE: Thank you. No further  
13 questions.

14 THE WITNESS: Thank you.

15 MR. MILUN: I don't have any  
16 questions.

17 THE REPORTER: All right. We're off  
18 the record at 1:04 p.m.

19 (Time Noted: 1:04 p.m.0  
20

21 \_\_\_\_\_  
NAKUL KARKARE, M.D.

22 Subscribed and sworn to before me

23 this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

24 \_\_\_\_\_, Notary Public  
25

CERTIFICATE OF DEPOSITION OFFICER

I, PAUL CHAMBERLAIN, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



PAUL CHAMBERLAIN

Notary Public in and for the  
State of New York

☒ Review of the transcript was requested.

CERTIFICATE OF TRANSCRIBER

I, ROCHELLE RANKIN, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



ROCHELLE RANKIN

## ERRATA SHEET

VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: AA Medical, P.C. v.

## Iron Workers Local 40, 361 & 417 Health Fund

DATE OF DEPOSITION: August 28, 2024

WITNESS' NAME: Nakul Karkare, M.D.

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NAKUL KARKARE, M.D.

Subscribed and Sworn To

Before Me This Day

of \_\_\_\_\_, 20\_\_.

Notary Public

My Commission Expires

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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